

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

JOHN J. MALONEY
DANI J. MALONEY

Debtors

Chapter 13

Bankruptcy No.23-12503-PMM

OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTORS

AND NOW comes Kenneth E. West, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtors, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtors have failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtors to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan violates 11 U.S.C. Section 1325(b)(2) in that it does not include all disposable income for the benefit of the unsecured creditors, and in particular, debtor(s) has/have failed to include the amounts that will be available once all pension loans have been paid.

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Kenneth E. West

Kenneth E. West, Esquire
Chapter 13 Standing Trustee